

EXHIBIT C

Ryan, Erin T. (CIV)

From: Ryan, Erin T. (CIV)
Sent: Tuesday, October 10, 2023 2:39 PM
To: St. John, Joseph; James Percival; Anita Patel
Cc: Ward, Brian C. (CIV); Reuveni, Erez R. (CIV); Fudim, Elissa P. (CIV); Redmon, Jordan
Subject: RE: AO Rule - Deposition Notices

Tracking:	Recipient	Read
	St. John, Joseph	
	James Percival	
	Anita Patel	
	Ward, Brian C. (CIV)	Read: 10/10/2023 2:59 PM
	Reuveni, Erez R. (CIV)	Read: 10/10/2023 3:01 PM
	Fudim, Elissa P. (CIV)	Read: 10/10/2023 2:43 PM
	Redmon, Jordan	

Scott,

We are reviewing through your objections to the deposition topics and will be in touch shortly about working through those, but in the meantime, do you have names and potential dates for your deponents? Our deadline to complete depositions is approaching and we'd like to try to get some schedules worked out.

Given your position below regarding the agencies, we can withdraw the notices to the individual agencies and just maintain the overall notice to the State of Louisiana. However, we have run into issues in the past with the State of Florida where, when they were trying to obtain deponents from the agencies to speak to the topics and agency injuries, the agencies required a notice specific to the agency. Hence why we provided both options.

Please confirm that the deposition notice addressed to the State of Louisiana will not prohibit you from being able to obtain the necessary deponents from the individual agencies to speak to the injuries alleged by the agencies and the agency documents produced during discovery. If so, we can withdraw the agency notices and just move forward with the notice to the state.

Given the upcoming deadline, if we don't hear from you with names and potential schedules by the end of the week, we will seek Court intervention to compel the information. We'd rather work through this with you and find mutually agreeable dates, rather than just picking dates on the calendar, but we'd also like to keep this process moving and get the depositions on the calendar.

Thanks,
 Erin

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Sent: Monday, September 18, 2023 11:36 PM
To: Ryan, Erin T. (CIV) <Erin.T.Ryan@usdoj.gov>; James Percival <James.Percival@myfloridalegal.com>; Anita Patel <Anita.Patel@myfloridalegal.com>
Cc: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>; Fudim, Elissa P. (CIV) <Elissa.P.Fudim@usdoj.gov>; Redmon, Jordan <RedmonJ@ag.louisiana.gov>
Subject: [EXTERNAL] RE: AO Rule - Deposition Notices

Please see the attached responses and objections.

As your email implies, LDOE, LDH, LDCFS, and LDPSC are distinct agencies, are not parties to this case, and are not represented by the Louisiana Department of Justice in connection with this matter. Accordingly, their depositions cannot be noticed.

Best regards,
Scott

From: Ryan, Erin T. (CIV) [<mailto:Erin.T.Ryan@usdoj.gov>]
Sent: Friday, August 18, 2023 3:18 PM
To: St. John, Joseph; James Percival; Anita Patel
Cc: Ward, Brian C. (CIV); Reuveni, Erez R. (CIV); Fudim, Elissa P. (CIV)
Subject: AO Rule - Deposition Notices

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Hi Scott and Jimmy,

Attached, please find 30(b)(6) deposition notices for the State of Louisiana and some of its agencies. A few notes: as there has been some confusion and disagreement in the past about the relationship between the state and its agencies, we included the same topics from the agency notices in the notice of the state of Louisiana. If the standalone notices for the agency are preferred, we can amend the notice to the state to remove those duplicate topics. We just included them in this format to cover both bases, but are open to discussing which way will be best for you to reach out to the agencies regarding witnesses.

We also include a notice for Louisiana's Department of Public Safety and Corrections to the extent those are injuries you are still planning to rely on to show standing. From some of your previous emails, you seemed to indicate that standing would be based on the Departments of Health, Education, and Children and Families, but the second amended complaint still contains a number of allegations related to public safety and corrections. If Louisiana is withdrawing their reliance on standing based on those injuries, we can withdraw the deposition notice.

We also left the deposition dates blank so we can find mutually agreeable dates that work for all counsel and your witnesses. We understand you will need time to talk with the agencies, determine who they are designating, and then check their schedules before you can agree to specific dates, so we are open to discussing dates once you have done that. However, to facilitate that, we will need to get an extension of the discovery deadline. Please let us know early next week how much time you think you will need to do all that, and a rough estimate of when you think we can schedule the depositions for, so we can determine the length of the extension we need. Off the top of my head, I assume we're talking about at least 2-3 months, but please let us know.

Finally, these notices are currently only for Louisiana. We understand there will be arguments made as to Florida's standing as well, and we are still evaluating whether we need depositions of Florida witnesses as well. We will let you know within the next week or two.

Thanks,

Erin Ryan
Trial Attorney
U.S. Department of Justice – Civil Division
Office of Immigration Litigation – District Courts Section

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